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Madam Chair and Members of the Committee,

My name is Jerry Davis. I am a retired civil engineer licensed in both Montana and Alaska. I retired from the federal government after 37 years in construction, design, construction management and regulatory compliance.

I oppose HB 558 simply because it puts, what appears to be, a site specific standard into law. Engineering standards are developed through scientific analytical studies by industry experts. Standards allow for consideration of site specific conditions. A project designer must take into account all of the variables that may exist for a specific site.

Considerations of industry standards and site specific conditions should be used to determine chloride additive rates. Using a one size fits all standard will lead to more problems than solutions. Site specific considerations may include but is not limited to such things as the fines fraction within the surfacing materials the plasticity and porosity of the surfacing material the fines fraction of the road base, the geometry of the road bed. Considerations may also be made for climatic factors such as humidity and the season of anticipated construction.

There are already standards that both state and federal agencies have adapted that allow a project designer to develop site specific specifications to ensure a safe and reliable result. Placing what appears to be a site specific standard into law will most likely cause problems with counties that do not have the same environmental or soils factors.

It is my understanding that this bill is the result of poor communications between the US Air Force and one or more county governments in central Montana. A better solution would be a law requiring an entity to provide their plans and specifications for approval by the county before being allowed to proceed. I believe this would be much more effective in eliminating these counties' concerns.

So in closing I reiterate, site specific standards have no reason for being in law, and if they are placed in law I suspect these standards will cause more problems than solve.

Please vote "Do Not Pass" for HB 558.

Thank you.